

Roderick Sawyer 75314
 Name
1200 Prison Rd
LOVELOCK, NV, 89419
775-273-4215
 Prison Number

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DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

Roderick Sawyer,
 Plaintiff,
 vs.
COLE Morrow ^{see Additional Page} for defendant(s)
COX GREG ^{see Additional Page} for defendant(s)
Graham OLAME ^{see Additional Page} for defendant(s)
GARCIA GENESA ^{see Additional Page} for defendant(s)
John DOE#1 ^{see Additional Page} for defendant(s).
 Defendant(s).

CASE NO. 3:10-CV-00088
 (To)

CIVIL RIGHTS COMPLAINT
 PURSUANT TO
 42 U.S.C. § 1983
Jury Trial Demanded

A. JURISDICTION

- 1) This complaint alleges that the civil rights of Plaintiff, Roderick Sawyer,
 (Print Plaintiff's name)

who presently resides at LOVELOCK, center 1200 Prison Rd Lovelock, NV 89419, were

violated by the actions of the below named individuals which were directed against

Plaintiff at HIGH DESERT STATE PRISON, INDIAN SPRINGS, NV 89407 on the following dates
 (institution/city where violation occurred)

"6-2-09", "8-5-09", "9-10-09", "10-6-09", and "11-9-09" 1-12-10.
 (Count I) (Count II) (Count III)

Additional Defendant's

6) Defendant, C. COLLINS, resides at HIGH DESERT STATE PRISON,
(full name of def.) (address of def.)

and is employed as SENIOR CORRECTIONAL OFFICER. This defendant is sued
(def. position and title, if any)

in (his)/her individual ☒ official capacity (check one or both).

Explain how this defendant was acting under color of law:

DURING MY HOUSING AT UNIT 1-A/B, PLAINTIFF ADDRESS DEFENDANT ABOUT HIS UNSANITIZED ISSUES
ACCORDING TO THE FILTHY CELL, AND TO CUT THE TIMER OFF THE TOILET, AND DEFENDANT DENIED ME.

7) Defendant, V. EVANGELISTA, resides at HIGH DESERT STATE PRISON,
(full name of def.) (address of def.)

and is employed as SENIOR CORRECTIONAL OFFICER. This defendant is sued
(def. position and title, if any)

in (his)/her individual ☒ official capacity (check one or both).

Explain how this defendant was acting under color of law:

ONCE I, ADVISED DEFENDANT WHAT WAS GOING ON ABOUT MY SITUATION, DUE TO MY UNSANITIZED
FILTHY CELL, ACCORDING TO THE DEFENDANT SUPPLYING THE PROPER CLEANING MATERIAL, HE DENIED MY REQUEST.

8) Defendant, JAMES HARPEL, resides at HIGH DESERT STATE PRISON,
(full name of def.) (address of def.)

and is employed as CORRECTIONAL OFFICER. This defendant is sued
(def. position and title, if any)

in (his)/her individual ☒ official capacity (check one or both).

Explain how this defendant was acting under color of law:

DURING MY HOUSING AT UNIT 2-C/D AFTER NUMEROUS DISCUSSIONS, DEFENDANT WAS HIGHLY AWARE OF
MY SITUATION FOR MONTHS AND HE REFUSE TO APPOINT ME WITH THE CLEANING SUPPLIES AND CUT TIMER OFF TOILET.

9) Defendant, J. KOTRONAKIS, resides at HIGH DESERT STATE PRISON,
(full name of def.) (address of def.)

and is employed as CORRECTIONAL OFFICER. This defendant is sued
(def. position and title, if any)

in (his)/her individual ☒ official capacity (check one or both).

Explain how this defendant was acting under color of law:

AFTER HEARING MY COMPLAINT DEFENDANT ADVISE PLAINTIFF THAT THEY, WHICH AS THE UNIT ONLY
GIVES OUT CLEANING SUPPLIES ON SATURDAYS, WHEN THAT DAY CAME PLAINTIFF ASKED TWICE AND HE REFUSE TO HELP.

Additional Defendant's

10) Defendant, C. SMITH, resides at HIGH DESERT STATE PRISON,
 (full name of def.) (address of def.)

and is employed as SENIOR CORRECTIONAL OFFICER. This defendant is sued
 (def. position and title, if any)

in (his)/her ___ individual ☒ official capacity (check one or both).

Explain how this defendant was acting under color of law:

DEFENDANT HAD CONVERSATIONS WITH PLAINTIFF FOR MONTHS, HE WAS FULLY AWARE OF MY HOUSING
CONDITIONS AFTER HE READ MY GRIEVANCES, HE SEEN MY COMPLAINT AS A NUISANCE AND REFUSE TO ASSIST ME.

___ Defendant, _____, resides at _____,
 (full name of def.) (address of def.)

and is employed as _____. This defendant is sued
 (def. position and title, if any)

in his/her ___ individual ___ official capacity (check one or both).

Explain how this defendant was acting under color of law:

___ Defendant, _____, resides at _____,
 (full name of def.) (address of def.)

and is employed as _____. This defendant is sued
 (def. position and title, if any)

in his/her ___ individual ___ official capacity (check one or both).

Explain how this defendant was acting under color of law:

___ Defendant, _____, resides at _____,
 (full name of def.) (address of def.)

and is employed as _____. This defendant is sued
 (def. position and title, if any)

in his/her ___ individual ___ official capacity (check one or both).

Explain how this defendant was acting under color of law:

**Make a copy of this page to provide the below
information if you are naming more than five (5) defendants**

2) Defendant COLE Morrow resides at High Desert State Prison.
(full name of first defendant) (address if first defendant)
 and is employed as Associate Warden of Programs. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Defendant Allegedly reviewed my grievances. However it should be noted that there was not a single attempt made upon his behalf to correct the hazardous unsanitary conditions.

3) Defendant Graham Duane resides at High Desert State Prison.
(full name of first defendant) (address if first defendant)
 and is employed as Case Worker. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: After responding to my grievances he stated that he had no control of the timers on the toilet, he insisted that cleaning supplies were available in the unit, but wasn't giving to me.

4) Defendant Garcia Genesis resides at High Desert State Prison.
(full name of first defendant) (address if first defendant)
 and is employed as Case Worker. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Defendant met with me suggested if I resolved/dropped my grievance then she would have the senior officer give me the cleaning supplies, but she or the staff never did so.

5) Defendant COX GREG resides at High Desert State Prison.
(full name of first defendant) (address if first defendant)
 and is employed as Grievance Responder - CCS-3. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: However after the LT and lockdown staff were notified they disregarded the aforementioned statutes. Never provided the cleaning material. as a result of there lack my health declined.

6) Defendant John DOE #1 resides at High Desert State Prison,
 (full name of first defendant) (address if first defendant)
 and is employed as Medical Staff Officer. This defendant is sued in his her
 (defendant's position and title, if any)
 ___ individual ☒ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: The medical staff much like the rest of the N.D.O.C. officials ignored my plea for medical attention and failed to provide medical care, which caused my mental status to deteriorate and compound

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

42 U.S.C § 1985 " 42 U.S.C § 1986

B. NATURE OF THE CASE

1) Briefly state the background of your case.

The Nature That This suit seeks damages, Equity relief and compensation
against the named defendant being employed by the state of Nevada, Clark County as
public officials or government employees for willfully, unlawfully and concerted
violating, corrupting or hindering profit, office trust and contract as well as the U.S
constitution treaties and laws. ON 6-2-04 until 1-12-10 plaintiff was severely
damage and punished, after being housed in the Administrative Lockdown segregation
units were not operating in a professional adequate way. According to the correctional
officers in the intake unit and lockdown they were not providing any cleaning
supplies and utensils to clean our cells with. The following materials are mop,
dust broom, toilet brush, scrubbing pad, Ajax, disinfectant spray, paper towels. However
nothing was provided to me in neither units, according to the design mistreatment
that was displayed occurring to the toilets that doesn't flush until every 30
See Page 3A

C. CAUSE OF ACTION

6) Defendant NA resides at _____
 (full name of first defendant) (address if first defendant)
 and is employed as _____. This defendant is sued in his/her
 (defendant's position and title, if any)
 _____ individual _____ official capacity. (Check one or both). Explain how this defendant was
 acting
 under color of law: _____

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

NA

B. NATURE OF THE CASE

1) Briefly state the background of your case.

Minutes has caused severe damages to my health. I was denied Adequate Medical treatment, After visiting the doctor, As a Result of being Placed in a UNKempt Environment with no cleaning supplies. The cell contained intoxicate body waste urinesmell from the toilet and floor Areas which occurred from other inmates that builded a Molded bacteria fungus trace inside my cell. As in Additional result of the Pain and suffering I have developed a respiratory illness that has caused vomiting DISORIENTED as well as headaches, weightloss, lassitude, Shortness of breath sleepiness, body aches, dizziness and untold amount of Physical Pain and mental depression was EXASPERATED by the lack of action on the Part of N.D.O.C. NV OFFICIALS who ignored my plea for help. I was subjected to a cruel and UNUSUAL Punishment, in violation OF MY 8th Amendment Right(s) OF The U.S. Constitution.

C. CAUSE OF ACTION

COUNT I

The following civil rights has been violated: Plaintiff was denied an INJURY resulted from the defendant(s) violation of the Plaintiff(s) First Through Fourteenth Amendment right(s) under the U.S constitution Particulary The right privilege and guarantee to safe, unhazardous sanitary and-

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

humane living conditions in accordance with the 5th, 8th, and 14th Amendment(s) protection against cruel and unusual punishment and Equal Protections, under The color of law on this killege date of 6-2-09. Plaintiff ouelled under the pain and suffering," due to the Allege starting date of 5-12-09. Plaintiff Advise, defendant C. COLLINS SENIOR CORRECTIONAL OFFICER OF UNIT 1-A/B for the following cleaning material and utensils to clean my cell with, defendant Then verified that he wasn't allowed to handout those type of materials to inmate(s) in the intake unit. After This first day of The Probable event, IT CONTINUE to ESCALATE again on these dates of 5-19-09, 5-25-09, 5-26-09 and 6-2-09. Plaintiff had continue to address defendant C. COLLINS for a Mop, dustbroom, toilet brush, scrubbing pad, A-JAX, Disinfectant spray, paper towels, and was denied these things. However Plaintiff seeked Probable cause to File informal Grievance on 6-2-09, due to the design/mistreatment of the toilet(s) that doesn't Flush UNTIL EVERY 30 MINUTES defendant C. COLLINS refuse to cut the timer off and by not doing so, SEVERE damages converted to affecting Plaintiff(s) health. ON 7-17-09 X-DEFENDANT GARCIA GENESA caseworker OF UNIT 2-C/A DENIED my informal grievance AND by doing so I WAS LEFT in a CRUEL and UNUSUAL Punishment. Furthermore defendant discuss with Plaintiff about the incident and Garcia GENESA suggested at the time that if Plaintiff resolve/dropping the grievances then she would have the available senior officer on shift to appoint me, with the cleaning supplies and utensils mention above to clean my cell. Therefore my grievances was not resolved and my physical and mental -

COUNT I

The following civil rights has been violated: _____

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

well being continue to deteriorate, And no-one came to assist me. Now between these dates of 6-3-09, 6-21-09, Defendant John Doe #1 Medical staff officer came to visit me to Examine my health conditions. Well unfortunately John Doe #1 Medical staff was much like the rest of the N.O.C. officials, who ignored my plea for medical attention, after Establishing the fact that I needed medical cure, John Doe #1 Medical staff failed to provide Medical remedy at the time and refusal of Plaintiff(s) visit on 12-7-09, after Plaintiff(s) filed a form for Medical assistance, as of X-Defendant Cole Morrow and his official(s) have left me in a UNKEMPT ENVIRONMENT without any cleaning material which lead Plaintiff to suffer in a ghastly cell that contained, "intoxicate body waste", urine smells from the toilet and floor area, which aroused a molded bacteria fungus trace inside Plaintiff(s) housing cell. As an additional result of the extreme abuse I mention, requiring to the pain and suffering I have developed a respiratory illness that has caused vomiting, disoriented as well as headaches, sleepiness, weight loss, dizziness, lassitude, shortness of breath, body aches and untold amount of physical pain and mental depression was Exasperated by the lack of action of X-Defendant Associate warden Cole Morrow and his N.O.C. official(s) have acted with negligence, repulsive, preposterous, performance by Ignoring the Plaintiff(s) plea for assistance.

COUNT II

The following civil rights has been violated: Plaintiff was denied and injury resulted from the defendant(s) violation(s) of The Plaintiff(s) First Through Fourteenth Amendment rights under the U.S constitution Particular, The right to Petition The Government due process and Equal -

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Protections in accordance with the 1st, 5th, 8th, and 14th Amendment(s) Protection against Arbitrary and retaliatory Government conduct, under the color of law on 8-5-09, Defendant Graham Duane caseworker of Unit 2-c/o violated my right(s) by responding to my grievances informing me that cleaning supplies were available in the unit 2-c/o to hand out, but where not issued out to me. Defendant Graham Duane met with plaintiff and further more stated that he had no control over the timer(s) on the toilet(s) even though they can be shut off, he is not in charge of doing so, and will not contact the person in charge of the timer(s) on the toilet(s) to shut them off, which requires me one flush every 30 minutes. Plaintiff then asked Defendant if there was someone on duty to supply me with the following cleaning supplies and utensils to sanitize my filthy toilet and cell however defendant ignored my plea for help. Previously before the date of 8-5-09, on these dates of "7-4-09", "7-24-09", "8-5-09", "9-13-09" and 11-26-09, Plaintiff asked defendant James Harpel, correctional officer of unit 2-c/o, during his shifts to help accommodate me with the following cleaning supplies and utensils, defendant replied that the unit doesn't have any of the material(s) to hand out. However Plaintiff, attend to believe Defendant James Harpel due to his sincerity, of our previous discussions we shared. However after pressing the issue so much to him on 7-28-09 plaintiff became a unit Poritor of 2-c/o and was eager to make his way around staff to observe the cleaning supplies and utensils available to be issued out to inmates that X- Defendant(s) James Harpel, C. Smith, V. Evangelista, J. Kotronakis, Graham Duane and Garcia Gemesa -

COUNT II

The following civil rights has been violated: _____

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

were harboring and hindering from Plaintiff(s) usage and comfortability. At the time of Plaintiff(s) Poritor job in the unit X-defendant(s) James Harper, C-smith, explained to Plaintiff that they were not allowed to give out any of the utensils and disinfectant chemicals, etc, supplies, "once Plaintiff advised defendant(s) that they were there to handout, Plaintiff seen a wrongful fault in X-defendant(s) James Harper, C-smith, who allegedly addressed that those type of cleaning materials couldn't be handout in the lockdown units. Anyhow on 9-10-09 X-defendant cole Morrow made a direct contact with X-defendant(s) James Harper, C-smith, that Plaintiff has filed a 1st level grievance and to remove him from the unit Poritor job immediately. On 9-11-09 Plaintiff asked defendant C. Smith senior correctional officer of unit 2-c/10 for the cleaning material and utensils, also on these dates of 9-17-09, 9-25-09, 10-1-09 - 10-2-09 and 10-17-09. And furthermore defendant replied to Plaintiff he will see what he could do but never attempt to do so, in fact defendant C. Smith read over my grievance complaints with X-defendant cole Morrow and he still refuse to acquaint Plaintiff with the following available materials, and this is after he already understood my conditions of physical illness and mental depression. Moving along to the dates of 11-9-09, until 12-8-09, Plaintiff begged defendant V. Evangelista senior correctional officer of unit 2-c/10, night shift, with the same issues, I was having and defendant advised Plaintiff that he was only available to gratify his own needs further as collecting his salary and that's it, and he's not about to cater to inmate(s) by handing out any cleaning supplies and utensils or cutting the timer off the toilet(s). Defendant V. Evangelista acted with -

COUNT II

The following civil rights has been violated: _____

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

disrespectable, unfashion way to deny EVERY REQUEST That Plaintiff Made. Now on the date of 12-30-09, ~~defendant~~ defendant J. KOTRONAKIS correctional officer of Unit 2-c/o advised Plaintiff that he would try to cut the timer off the toilet but failed the attempt. Anyhow Plaintiff asked J. KOTRONAKIS for the following cleaning materials and utensils. Defendant replied with that the unit only hands them out on Saturdays only. According to that following date of Saturday ON 1-2-10, Plaintiff asked defendant then for the following cleaning material and utensils twice that day and defendant J. KOTRONAKIS never made any attempt to supply Plaintiff with any of The Adequate materials. Plaintiff Allege to follow all the proper Grievance procedure(s) and they were all denied. ~~by~~ Defendant, COX Greg, as noted The Second level Grievance responder denied my second level Grievance on 11-9-09, but Plaintiff never received the denial response until 1-11-10, due to The immediate Prison transfer ruled out from H.O.S.P to L.C.C on 1-13-10, BE Advise, all Lockdown X-defendant(s) officers James Harrel, C. Smith, V. Evangelista, J. KOTRONAKIS, "Graham Duane and Garcia Genesis disregarded the aformentioned statutes of OP 502, OP 711, OP 718, and OP 721, as written/stated by defendant COX Greg, they never provided the Available cleaning material and utensils, due to There lack of Action Plaintiff(s) health has continue to deteriorate and decline.

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the same or similar facts as involved in this action? ____ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

COUNT III

The following civil rights has been violated: Plaintiff was denied and injury resulted from the defendant(s) violation(s) of the Plaintiff(s) first through fourteenth amendment right(s) under the U.S. constitution Particularly the right privilege and guarantee to adequate "viabile".

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Substantial and reasoned medical treatment and facilitation in accordance with the 5th, 8th, and 14th Amendment protection against cruel and unusual punishment, unequal treatment as well as Medical negligence pursuant to state law, due to the fact that defendant(s) refuse to acquit Plaintiff with any of the following items Plaintiff rights) were violated and therefore plaintiff still suffers from the ghastly events) I adventured. Each prisoner by state of law is allowed to have additional access to the following cleaning supplies and utensils and medical care treatment that were not offered to me due to the lack of. N.O.D.C. Officials gave Plaintiff enough Probable cause to build a civil rights) claim. Although the Ho'sip has there policy(s) on there toilet timers as stated in the state of Nevada statute, each prisoner should have access and full control of his/her toilet pertaining to the unlimited amount of flushes not except in the case of prisoner(s) who are in Maximum custody as high protective risk. In this instance neither Epic, contains to Plaintiff custody status, therefore Plaintiff should have had full access-control of his cell toilet flusher. Plaintiff has been allegedly terrified of Ho'sip Officials since the incident. However X- Defendant John Doe #1 Medical staff doctor (proceeded) an examine on Plaintiff during visit but did not provide Plaintiff with any medical treatment that was sufficient cause for Plaintiff to fault John Doe #1 at wrong for allowing the commander of Plaintiff(s) physical and mental depression continue to decline and deteriorate in a unsanitized housing cell. These events that constituted negligence as listed above in counts) 1, 11 could of been resolved by quick and corrected actions of defendant Associate Warden Cole Mann

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the same or similar facts as involved in this action? ☐ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: NA
- b) Name of court and docket number: _____
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):

- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted**?
___ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: NA
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): ___ frivolous
___ malicious or ___ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: NA
- b) Name of court and case number: _____

- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: NA
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ☒ Yes ☐ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) _____ disciplinary hearing; (2) _____ state or federal court decision; (3) _____ state or federal law or regulation; (4) _____ parole board decision; or (5) _____ other _____.

If your answer is "Yes", provide the following information. Grievance Number 2006287474/.

Date and institution where grievance was filed 6-2-2009 High Desert State Prison.

Response to grievance: AS NOTED AT THE 1st LEVEL, THE INFORMAL LEVEL IS AN APPROPRIATE RESPONSE
FURTHERMORE ALL UNIT STAFF HAS BEEN ADVISED BY THE LOCKDOWN/LIT'S, TO REVIEW, OP 502', OP, 711'
OP 718, AN OP, 721 CLEANING SUPPLIES ARE AND HAVE BEEN AVAILABLE IN UNIT 2 C/O, GRIEVANCE DENIED.

Monetary Damages

E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

I Plaintiff seeking \$89,300⁰⁰ Eighty Nine Thousand and Three Hundred dollars
in Monetary Damages. Preliminary Injunction (hearing): "enjoining H.O.S.P. Nevada
DEPT OF CORRECTIONS officials from disregarding cleaning supplies allocation upon
request, H.O.S.P from only allowing for two (2) Flushes Every hour in
regards to the toilets. Declaratory Judgment declaring The act(s) edit(s)"
edit(s) omission(s) and action of the defendant(s) name unconstitutional.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

NA-

(Name of Person who prepared or helped
prepare this complaint if not Plaintiff)

Jaeger Roderick

(Signature of Plaintiff)

February 8th 2010

(Date)

(Additional space if needed; identify what is being continued)

NA-

Certificate of Service

I hereby certify that a copy of the foregoing document was mailed to
ATTORNEY GENERAL FOR STATE OF NEVADA, CATHERINE COFFEY MASTRO
(Name of opposing party or counsel)

at 100 N. CARSON ST CARSON CITY, NEVADA 89701-4717
(address)

ON February 8th, 20 10.

Jaeger Federico
(signature)